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November 8, 2015

VIA E-FILING

Ann Marie Donio, U.S.M.J.
United States District Court
District of New Jersey
Fourth & Cooper Streets
Camden, NJ 08101

RE: Atlantic City v. Zemurray, et. al
Docket No.: 14-cv-05169

Dear Judge Donio:

I was recently retained to represent Defendants Gary A. Lax, Michael J. Lax, Tennessee Business and Industrial Corporation a/k/a Bidco, Lantan Family Trust 1 in the above matter.

I am writing to request a telephone conference with the Court prior to filing a motion for an extension of time in which to answer and/or otherwise move. I have not reached out separately to the Plaintiff's counsel, which I intend to do today. However, in an abundance of caution, I wanted to reach out to the Court in the event a motion is necessary, and in the event that the Court would need a detailed explanation to grant the time I am seeking.

It is my understanding, that as of the date of this letter, there is still no proof of service for Defendant Taipan Trust. I do not and will not be representing that entity. It is also my understanding that the Plaintiff has produced a large number of documents in Rule 26 Disclosures that pertain to my clients as well as the original Defendants in this matter. I have not had the opportunity to review those documents, and I must, prior to filing a responsive pleading. I am also assuming that the Defendant has produced documents, but I have not ascertained that fact as of the writing of this letter.

I have had one detailed telephone conference with the Defendants that I have been retained to represent, however, I need the documents, and to have my clients' assistance with documents before I am even able to determine whether there is any merit to the claims pled in the Amended Complaint.

I will be calling the Plaintiff's counsel November 8, 2015 to determine whether there is any objection to the extension of time, and to ascertain how long it will take to receive copies of the documents produced.

Please advise as to whether the Court will require a telephone conference prior to the current telephone conference which is scheduled for **November 17, 2015, at 12:00 pm**, or whether the Court will address the issue of granting an extension of time to Answer and/or otherwise move during that conference call.

Thank you for your attention and courtesies in this matter.

Respectfully,
/s/Cheryl L. Cooper

cc: Felix Gonzalez, Esquire – via ECF
Thomas E. Monahan, Esquire – via ECF